



Michael <melendezclaim@gmail.com>

Melendez - Supplemental

Michael <melendezclaim@gmail.com>

Mon, Mar 11, 2024 at 9:23 AM

To: gmanousos@morganbrown.com, Jcollins@morganbrown.com

Cc: jasarese@morganbrown.com

Mr. Manousos,

I am submitting the attached documents for review per Local Rule 7.1(c).

Per Court rule, all parties are to confer in good-faith.

Please be advised, my claims will inevitably proceed. Mr. Manousos, in the interest of efficiency, please communicate in good-faith.

If there is any reasonable and legitimate opposition to my supplemental complaint, please specify more than your client opposes. This gives an opportunity to actually address the motion prior to filing. Thank you.

Very Respectfully,
Michael Melendez

3 attachments



Memo - Fifth Amend Complaint.pdf

148K



Motion - Fifth Amend Complaint.pdf

146K



UNH - Fifth Amended Complaint.pdf

306K



Michael <melendezclaim@gmail.com>

Melendez - Supplemental

Manousos Gregory <GManousos@morganbrown.com>

Mon, Mar 11, 2024 at 4:28 PM

To: Michael <melendezclaim@gmail.com>

Cc: "Abuwar, Jenna" <jabuwar@morganbrown.com>, Manousos Gregory <GManousos@morganbrown.com>

Good afternoon Mr. Melendez,

I have reviewed your proposed Motion to Amend, and I have discussed it with the University. The University's ET&S (information technology) department had already been in the process of investigating your concerns about your access to your UNH email account after your call to the IT Help Desk last week.

It appears that you may have been using an incorrect username, and that is why you weren't able to access the account. Copied below is some information about how to access your account. Can you please try this and let me know if it works? If so, I trust that you agree that there is no need or basis for amending your Complaint. Please advise, and thank you.

Greg Manousos

Mr. Melendez's username is **mam1410**. His fully qualified username is **mam1410@usnh.edu**

Instructions for logging in with the fully qualified username can be found here: <https://td.usnh.edu/TDClient/60/Portal/KB/ArticleDet?ID=4692#how-login>

Mr. Melendez currently has an **UNH-Active-Prior-Student** role. As long as he maintains an active password (next expiration date is July 22, 2024) then his email account will remain active. Should he fail to update his password, then the account will fall into an abandoned state and after a period of time, the account will automatically delete.

It may also be helpful for you to know about this Knowledge Base article "FAQs for Graduating and Departing Students".

Gregory A. Manousos (he/him)



E gmanousos@morganbrown.com

P (617) 523-6666 D (617) 788- 5010

C (617) 306-7776

200 State Street, Suite 11A, Boston, MA 02109

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Michael <melendezclaim@gmail.com>

Melendez - Supplemental

3 messages

Michael <melendezclaim@gmail.com>

Tue, Mar 12, 2024 at 7:58 PM

To: Manousos Gregory <gmanousos@morganbrown.com>, Jcollins@morganbrown.com

Cc: "Abuwar, Jenna" <jabuwar@morganbrown.com>

Mr. Manousos,

It is apparent you do not wish to discuss the matter of my supplemental complaint. I intend to send the complaint this Friday. You have until then to make up whatever futile "legal" reason you believe you may have. You should be reminded of the ethical responsibility to cooperate in this matter, and not stall the case as a defense.

If there is an immunity or a legal reason, such as a 12(b), I should be aware of, now is the time to let me know. Thank you.

Very Respectfully,
Michael Melendez

Manousos Gregory <GManousos@morganbrown.com>

Tue, Mar 12, 2024 at 9:08 PM

To: Michael <melendezclaim@gmail.com>

Cc: "Abuwar, Jenna" <jabuwar@morganbrown.com>, Manousos Gregory <GManousos@morganbrown.com>

Mr. Melendez,

I've been tied up with many other matters, and have not had a chance to fully address your email with my clients. I'll be in touch in the next day or so.

Greg Manousos

Gregory A. Manousos (he/him)



E gmanousos@morganbrown.com

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[Quoted text hidden]

Michael <melendezclaim@gmail.com>

Wed, Mar 13, 2024 at 10:09 AM

To: Manousos Gregory <GManousos@morganbrown.com>, Jcollins@morganbrown.com

Cc: "Abuwar, Jenna" <jabuwar@morganbrown.com>

Mr. Manousos,

I don't care to hear about your personal issues or process. You have my deadline. Thank you.

Very Respectfully,
Michael Melendez

[Quoted text hidden]



Michael <melendezclaim@gmail.com>

Melendez - Supplemental

Manousos Gregory <GManousos@morganbrown.com>

Thu, Mar 14, 2024 at 1:11 PM

To: Michael <melendezclaim@gmail.com>

Cc: "Abuwar, Jenna" <jabuwar@morganbrown.com>, Manousos Gregory <GManousos@morganbrown.com>

Mr. Melendez,

Your proposed amendment to the Complaint, and specifically Claims 19 -21 (Paragraphs 280-310) is completely refuted by the facts set forth below:

- As I noted in my email below, your email account has not been "deleted," and accordingly your allegation to this effect in the proposed Fifth Amended Complaint is demonstrably false. It appears that you were using incorrect credentials, and I provided you with specific instructions for accessing your account. If you choose to ignore that email, and instead represent to the Court that your email account has been deleted, this is untrue and we will call this to the attention of the Court.
- If, after following the instructions below, you still cannot access the email account, you can contact UNH's Identity and Access Management (IAM) group (rather than going through the IT Help Desk again) and they will work with you to identify and solve the issue. The Director's contact info is as follows, so you can contact him, and he or one of the IAM engineers will work with you to resolve any access issues: Joseph Gray, Director of Cyber Security Operations & Identity and Access Management, 1 Leavitt Lane Durham, NH, Room 104, 603-862-3503, Joseph.Gray@unh.edu
- Your allegation in the proposed Fifth Amended Complaint (Par. 282-294) that an unnamed "Defendant Doe" who purportedly works for Enterprise Technology & Services "abused his ability to access student's accounts to covertly access Plaintiff Melendez's email account" is false and lacks any factual support. The automated email that you received on January 2, 2024, which prompted you to complete a survey to rate the customer service related to a call you had made to ET&S in August 2022 (18 months ago) for assistance in resetting your password, was sent in error. This is why you received a second email instructing you to disregard this email. It was obviously sent in error, as ET&S would not be sending a survey about a customer service call from 18 months prior; such survey emails are sent out promptly after the customer service call is completed. Other UNH email account holders received the same automated email in error, as well as the second email instructing them to disregard the first email. An example of such an email is attached hereto (I have redacted all but the initials of the person who received that email, as the identity of that person is not pertinent). Moreover, there is nothing about the email you received which indicates that anyone was seeking to covertly access your email account. The email, as you acknowledge at Par. 285 of your proposed Fifth Amended Complaint, merely asked you to complete a survey relating to a customer service call. The preceding facts demonstrate that this email had nothing to do with you, or your lawsuit against UNH, and there is no evidence whatsoever that someone was covertly trying to access your account.

Should you proceed with the proposed Motion to Amend and therefore present demonstrably false statements to the Court, UNH will oppose the Motion. In addition, because the proposed Motion is frivolous and not advanced in good faith, we will ask the Court to require you to pay UNH's attorney's fees in opposing this Motion and to issue other sanctions against you, as appropriate.

Greg Manousos

[Quoted text hidden]



Screenshot 2024-03-12 at 10.43.17 AM.png
89K



Jordan Abbott <jae.marie614@gmail.com>

Fw: Satisfaction Survey for Ticket #529848 - Password

Michael Melendez <Michael.Melendez@law.unh.edu>
To: Jordan Abbott <jae.marie614@gmail.com>

Mon, Feb 26, 2024 at 10:02 AM

From: Enterprise Technology & Services Survey (DO NOT REPLY) <notify.teamdynamix@unh.edu>
Sent: Tuesday, January 2, 2024 11:27 AM
To: Michael Melendez <Michael.Melendez@law.unh.edu>
Subject: Satisfaction Survey for Ticket #529848 - Password

You don't often get email from notify.teamdynamix@unh.edu. Learn why this is important

Dear Michael,

As part of our commitment to improving your customer experience, we are asking you to complete a brief survey for your recent request: **Password (529848)**.

This survey consists of a few multiple choice questions, and should take you no more than a minute to complete. To take the survey, click the following link:
https://td.usnh.edu/TDClient/60/Portal/Surveys/TakeSurvey/SQuXNltBE24_?responseId=1n5PoAFDxr4_

Your feedback is important to us and we appreciate your time.

Thank you in advance,
Enterprise Technology & Services (ET&S)
KSC | PSU | UNH | USNH

****Please do not reply to this email. If you need additional assistance with your request, contact your campus ET&S Help Desk.****